USEPA Region 5-Illinois EPA Monthly Air Permits Call

DATE: September 15, 2009

SUBJECT: Air Permits Conference Call of August 18, 2009 FROM: Constantine Blathras, Environmental Engineer

ARD/APB/Air Permits Section

TO: Files

THRU: Pamela Blakley, Section Chief

Next month call: 10:00 AM, September 29, 2009 Call-in number: 217-557-2438

The following are notes from the subject conference call. Representing USEPA was Constantine Blathras. Representing Illinois EPA were Jason Schnepp, Kevin Hecht, Minesh Patel, Manish Patel, Kevin Smith, Bob Smet, Shashi Shah, Chris Romaine and Ed Bakowski. These conference calls/meetings are for gathering permitting information, identifying issues of potential concern and initiating discussion for timely resolution of issues. USEPA comments made during these calls are tentative and subject to modification upon further review of factual data. IEPA has updated the RBLC to add information on recently issued permits. IEPA will also inform EPA when the permit application is ready for consultation under the Endangered Species Act (ESA).

KEVIN SMITH

ISG/Mittal Steel (Riverdale, Cook Co.); ESA-no: This company proposes to construct two new electric arc furnaces (EAF) to replace the basic oxygen furnaces at its existing steel making plant. The project will be a major PSD/NSR project for VOC, NOx, and PM. No change in status, reviewing modeling. Sent letter for modeling concerns, have not yet received a response. No change.

Afton Chemical (formerly Ethyl Petroleum), (Sauget, St. Clair Co.); ESA-no: This company proposes to revise its permit for its transmission oil additive process for BACT for the condenser. The condenser removes H2S and CS2 gases at -35-40oF before passing to a flare. The permit requires operation of the condenser properly to assure vapor liquid separation, compliance would be done by a mass balance and presume the emissions are

sent to the flare. IEPA met with company to get additional information for application, additional information on BACT analysis needed. No change, working on draft.

BOB SMET

Power Holdings Corp., (Ashley, Jefferson Co.); ESA-yes: This project is for a coal to substitute natural gas SNG plant. IEPA is working on the air quality analysis. Company has submitted a revised application. The company selected a new site and submitted a new application. The comment period closed on May 4. IEPA is working on the response to comments document.

Wheatland Tube, (Chicago, Cook Co.); ESA-no NSR: This company is revising its LAER permit, and will install a new mill which is projected to avoid NSR review (the NAA ozone threshold for Chicago is 25 tpy). No change in status. There may be a second mill application coming in. IEPA will probably wait to process both permits at once. On hold.

MGP Ingredients (what used to be Midwest Grain Products) (Pekin, Tazewell Co.); ESA-yes: has come in with a permit application for a 525 mmBtu/hr coal-fired boiler for their plant in Pekin. It will trigger PSD for SO2, NOx, and other pollutants. Although the SO2 emissions were modeled at a non-significant impact level of 4.89 micrograms per cubic meter, this is too close to 5 in an area that has recently experience an SO2 exceedance. Public comment period closed, finalizing response to comments. The issued permit was appealed to the EAB The petitioner raised CO2 GHG issues and that the permit application did not analyze clean fuel alternatives.

Raven Energy (Johnston City, Williamson Co.); ESA-no synthethic minor: This company is proposing an SNG plant. The site will process 2.5 million tons of coal for gasification. The proposed project is expected to be minor. The proposed company is to be located next to Williamson Energy. Williamson Energy operates a coal prep plant and Raven will accept 1/3 of Williamson's output. Raven Energy and Williamson are owned by the same company. No change. The company may submit a new application.

Bio Pro Biomass Energy (Rock Falls, Jo Davies Co.); ESA-not PSD: This company is proposing a 25 MW boiler. This boiler would also burn corn stover. IEPA provided company with draft of draft permit. The draft permit is out to public notice.

Chicago Cement (Lake Calumet, Cook Co.); ESA-no: This company proposes to construct a cement kiln and associated equipment. The project will be major for NOx, SO2, and CO. IEPA is preparing a letter requesting additional information from the company. IEPA has requested additional information from the company.

<u>Taylorville Energy Center:</u> extension to construction permit. IEPA will hold a public hearing on the extension request.

<u>Jo Carol Energy:</u> wood fired boiler. There is not application yet.

JASON SCHNEPP

<u>US Steel; ESA-yes:</u> Clean up a PSD permit. Facility is currently in "hot-idle" mode. Review of this application has not begun.

ExxonMobil Oil Corporation, (Joliet, Will Co.); ESA-no, synthetic minor: This is the second phase of the NSR Controls Project required by the Global NSR Consent Decree. In conjunction with the installation of additional controls, the refinery will also make changes that will result in increases in emissions. This will be a netting exercise for several pollutants. The draft permit will be out for public notice soon. Permit was issued 9/15/2009. No public comments received.

Material Sciences Corporation, (Elk Grove Village, Cook Co.); ESA -no, NA NSR: This is a revision of a previously issued NA NSR permit. The company would like to increase utilization of lines that currently are restricted due to installation of a Line 18, which required the NA NSR permit (internal offset issue). The draft permit is out for public notice. Public notice ends 9/27/2009.

Printpack Inc., (Elgin, Kane County); ESA-no, synthetic minor: Installation of a new rotogravure printing press. New press emissions will be 49 tons/year. Company has chosen to perform a netting exercise. No other contemporaneous projects, however, in conjunction with this project, existing press will get upgraded controls and a laminator will be controlled. Net emissions change is about 20 tons.

MINESH PATEL

Vulcan Materials, (Manteno, Kankakee Co.); ESA-yes: This company had a PSD permit that is being revised to switch out a wet scrubber for a dry scrubber which had never been installed. The company had closed temporarily and is hoping to operate after installing a dry scrubber and adding a preheater kiln tower. IEPA is working on the air quality modeling analysis and has requested additional information. They expect it will be moving to public notice soon. There is currently an enforcement action pending. IEPA is reviewing the PM modeling and projected air concentrations. Draft permit soon to public notice. The comment period has been extended to July 22, by public request.

Marquis Energy (Hennepin, Putnum County): This company has applied for revision to construction permit to increase design capacity from 110 mmgal/yr to 125 mmgal/yr. No construction is required as this increase is achieved through improved operating procedures for the plant as achieved at other similar plant. Public Hearing was held on July 22, 2008. Comment Period Ended August 21, 2008. Awaiting review of test results. No change.

The IEPA has a summary list of fuel ethanol plant projects in Illinois available on its website:

http://www.epa.state.il.us/air/permits/ethanol-plants.html. The information is based on the bureau of air's permit and application files.

Aventine Renewable Energy for Pekin III Project (Pekin, Tazewell County): Submitted an application for expansion of 108 million gallons per year dry mill ethanol plant. The proposed ethanol plant would be a stand alone facility (would not be utilizing any of the existing wet mill or dry mill operations). The proposed facility would be a major modification subject to PSD regulations. IEPA sent a lateness notice to the company.

<u>Mississippi Lime:</u> Will be submitting a PSD application for a lime kiln. Have received permit application. Working on draft.

MANISH PATEL

Corn Products ARGO, (Bedford Park, Cook Co.), ESA-no: This company proposes to install a destarching unit and increase the existing equipment operating hours. The will be not be major for PM, PM10, and PM2.5, netting out of review. IEPA is in the final stage of drafting permit. On hold.

Garden Prairie Energy c/o Power Venture Group, (Boone co.), ESAno: This company is proposing a 101 MW natural gas-fired internal combustion engine peaker power plant. The proposed plant would also support wind power projects in northern Illinois by serving as an alternative source of power during low-wind periods. The plant will have 12 engines, each with a SCR and a catalytic oxidizer. Request for Additional Information letter sent.

Annawan Enegry c/o Power Venture Group, (Henry co.), ESA-no:
This company is proposing a 101 MW natural gas-fired internal combustion engine peaker power plant. The proposed plant would also support wind power projects in northwest Illinois by serving as an alternative source of power during low-wind periods. The plant will have 12 engines, each with a SCR and a catalytic oxidizer. Request for Additional Information letter sent.

Eastern Illinois University, (Charleston Co.), ESA-no: This university is proposing a renewable energy plant to burn biomass and wood. They will be retiring an existing coal fired boiler and will be netting out of PSD review. Public comment period ended 10/30/2009.

KEVIN HECHT

No permits to report on.

SHASHI SHAH

Baldwin Expansion, LLC (Dynegy Midwest, formerly Illinois Power)
(Baldwin, Randolph Co.); ESA-no: \$1.5 billion, two 750 MW coalfired boilers. 4 - 5 million tons of coal a year by rail/barge.
Adding 1500 MW to current 2000 MW from 3 existing boilers at
Baldwin Power Plant, approx. 50 miles southeast of St. Louis.

Two new boilers to fire pulverized coal, 750 MW nominal, each (total increase in plant capacity 1500 MW). Selective catalytic reduction (SCR), SO2 scrubbers, and electrostatic precipitators proposed, exhausted through single 590 foot stack (two separate flues).

16,500 tons of SO2, 7,450 tons NOx, 2,250 tons PM total (filterable and condensible), 330 tons VOM and 0.1 tons of mercury. These limits reflect proposed emission limits of 0.25. 0.12 and 0.034 lb/mmBtu for SO2, NOx and PM (total),

respectively. After three years, proposed emissions for NOx would drop to 5,300 tons, based on compliance with NOx emission rate of 0.08 lb/mmBtu. Limits may be lowered due to IL EPA evaluation of BACT/LAER. The application does include an air quality analysis. NOx and CO impacts not significant. PM and SO2 modeling shows compliance with NAAQS with a fair margin of compliance.

Dynegy does plan to submit further modeling to address impacts on the nearby Mingo Wildlife refuge, a Class I Area under PSD. This modeling would show that even with the proposed expansion, emissions of SO2 and NOx from Baldwin would be significantly lower than the plant's actual emissions in recent years, i.e., 1996 through 2000.

IL sent letter to source requesting further info. The company is doing modeling to address violations to NSR and a switch from IL coal to PRB coal. Send email to source about permit status, no response from company. No change.

Teepak (Danville, Vermilion Co.); ESA-yes: The company is proposing 1 line 3 existing lines. This project is now a PSD project and the company has submitted a new application. Finalizing draft permit, soon to public notice.

Wedron Silica, (Wedron, LaSalle Co.); ESA-no: This company proposes a sand coating operation process used in oil and gas production refraction. A 112(g) determination has being done. The draft permit is out to public notice last week.